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BY ECF

Hon. Richard M. Berman
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 17B
New York, New York 10007

JPMorgan Chase Bank, N.A. v. Freyberg
Case No. 14 CV 6851 (RMB)

Dear Judge Berman:

We are counsel to plaintiff JPMorgan Chase Bank, N.A. ("Chase"). My colleague Bruce Goodman is responsible for handling this matter on a day-to-day basis. Due to a death in his immediate family Bruce is out of the office this week. Accordingly, we request a one week extension of Chase's time to file a reply to defendant's cross-motion and opposition to Chase's motion for summary judgment.

Consistent with this Court's revised briefing schedule, on May 27, 2015 Chase made its motion for summary judgment [ECF No. 47]. On June 29, defendant filed opposition and a cross motion [ECF No. 54]. By order dated July 1, 2015 this Court approved an extension from July 13, 2015 to July 20, 2015 for Chase to file its reply, and from August 3, 2015 to August 10, 2015 for defendant to file a sur-reply. Until now, this was the only request for an adjournment of Chase's motion.

Pursuant to this Court's Individual Practices I approached defendant's counsel to seek his consent to this request. Counsel consented upon the condition that defendant's time to file a sur-reply is extended by two weeks. Accordingly, we ask this Court to modify the briefing schedule and to extend the time for Chase to file a reply from July 20, 2015 to July 27, 2015 and for defendant to file its sur-reply from August 10, 2015 to August 24, 2015 or such other dates as this Court deems appropriate.

We thank the Court for its courtesy.

Respectfully,

Barry J. Glickman

cc: Michael James Giusto, Esq. (by ECF)